

**REMARKS**

In response to the Examiner's Office Action of April 6, 2009, Applicants are herein presenting their considerations and response to the Examiner's Office Action. Claims 43 and 45-78 are cancelled. New claims 79 -- 97 are currently added to more clearly describe the invention. Applicant respectfully submits that no new matter has been added and that support for the new claims can be found through the application as originally filed, for example on pages 3, lines 4 -- 34, and page 6, line 24 -- page 7 line 32.

**Rejections under 35 U.S.C. §112**

Claim 75 is rejected under 35 U.S.C. §112. Applicant respectfully submits that the rejection of claim 75 under 35 U.S.C. §112 is moot in view of the present amendment.

**Rejections under 35 U.S.C. §103**

Claims 43, 45-60, 64, 70-71, 74-75 and 78 are rejected under 35 U.S.C. 103 as being unpatentable over U.S. Patent No. 6,193,155 to Walker et al. (hereinafter "Walker") in view of U.S. Publication No. 2002/0069104 to Beach et al. (hereinafter "Beach") and further in view of U.S. Patent No. 6,044,471 to Colvin (hereinafter "Colvin"). Claims 61, 65-69 and 72-73 are rejected under 35 U.S.C. 103 as being unpatentable over Walker in view of Beach and further in view of Colvin and U.S. Patent No. 6,014,634 to Scroggie et al. (hereinafter "Scroggie").

Applicant respectfully submits that each of the claims rejected under 35 U.S.C. 103 are cancelled herein and new claims 79 -- 97 are added to more clearly describe Applicant's invention as being directed to an e-commerce payment system and method involving pre-paid vouchers.

Applicant respectfully submits that no combination of the cited references teaches or suggests the claimed payment methods or electronic commerce payment system including "generating said prepaid voucher in response to receiving said order and said payment" as claimed in new claims 79 -- 97. Applicant submits that Walker, for example, is not directed

toward prepaid vouchers as claimed such as gift certificates, travel tickets, entertainment tickets etc. Rather, Walker is directed to gift certificates that are associated with a credit card account (col. 5, lines 6 – 7) wherein the credit of the user is extended to a recipient and verified upon redemption. Thus, Walker requires the user to have credit and an account with a credit card issuer. Applicant submits that the use of credit vouchers teaches away from the use of a pre-paid vouchers as particularly claimed in the present application.

Further, Scroggie, for example, teaches a method of providing shopping incentives such as coupons which do not teach or suggest Applicant's claimed pre-paid vouchers. Applicant also respectfully submits that neither Beach which is directed to generating personal ID numbers, nor Colvin which is directed to securing software to reduce unauthorized use, teach or suggest anything about Applicant's claimed pre-paid voucher payment system and method.

Further, Applicant respectfully submits that no combination of the cited references teaches or suggests each element of new claims 84 and 90 – 97 which are directed to subscriber retailers, wherein the customer purchases a voucher for one of a list of subscriber retailers and the subscriber retailers have access to the claimed verification system.

Contrary to the Examiner's characterization of Walker and Scroggie, with regard to claim 66 (Office Action, page 17, lines 10 – 12), for example, Applicant respectfully submits that neither Walker nor Scroggie teach or suggest anything about a plurality of subscribing goods/services retailers. Rather, the cited portions of Scroggie describes dynamic coupon creation for any retailers. Walker, on the other hand, describes participating merchants wherein "[a] participating merchant is one that is capable of processing credit card transactions on behalf of the credit card issuer designated on the gift certificate..." Col. 5, lines 32 – 44. Walker's "participating merchant" does not teach or suggest a "subscriber retailer" as described and claimed in the present application.

Since no combination of the cited references, and no combination of previously known art known to the Applicant teaches or suggest each and every element of claims 79 – 97, Applicant respectfully submits that the new claims are allowable. Reconsideration is respectfully requested.

**CONCLUSION**

If any points remain an issue which the Examiner feels may be best resolved through a telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below. The Examiner is invited and encouraged to telephone the undersigned with any concerns in furtherance of the prosecution of the present application.

Please charge any deficiency as well as any other fee(s) which may become due at any time during the pendency of this application, or credit any overpayment of such fee(s) to Deposit Account No. 50-2896.

Respectfully submitted,

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Dated:

Joseph P. Quinn  
Joseph P. Quinn (Reg. No. 45,029)  
Customer No. 71130  
Attorney for Applicant(s)  
SEYFARTH SHAW LLP  
World Trade Center East  
Two Seaport Lane, Suite 300  
Boston, MA 02210  
Tel: 617-946-4833  
Fax: 617 946-4801  
E-mail: [bosippto@seyfarth.com](mailto:bosippto@seyfarth.com)